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Federal Defenders OF NEW YORK, INC.

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n7-8700 861 12127591-0392 ELECTRONICALLY FILED

DOC Juniter L. Brown

DATE FILED: 6/22/15

David E Patton
Executive Director

June 22, 2015

Via Facsimile and ECF
The Honorable Kimba A. Wood
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

to resumptions

Re: United States v. Kalaminsky Harris,

13 CR 678 (KMW)

Your Honor:

I write to make a request for international travel on behalf of my client, Kalaminsky Harris, who was sentenced by the Court on April 7, 2015. Mr. Harris would like to travel from September 11 – 17, 2015 with his family to Anguilla in the West Indies where Mr. Harris' grandfather lives. Mr. Harris' grandfather will be hosting the family.

As the Court may recall, Mr. Harris is a bright young man (the first in his family to go to college). He pleaded guilty to picking up packages containing drugs for an older mentor he met on the basketball courts. He was 22 years old at the time of the offense conduct. The offense was Mr. Harris' first (and certainly last) brush with the criminal justice system. At sentencing, the government moved for a below guidelines sentence and the Court spared Mr. Harris from a prison term and sentenced him to a period of three years of supervised release.

Mr. Harris, who is now almost 25 years old, has been on supervised release for over three months. He has been fully compliant with the terms of his supervised release. He is employed and supports his mother and siblings, including his sister who suffers from Spina Bifidia.

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The Honorable Kimba A. Wood Page 2 of 2

June 22, 2015

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13 CR 678

The Probation Department requires Court approval in order to permit the travel because it is the Probation Department's policy (in all cases) to otherwise oppose requests for international travel within the first six months of a term of supervised release.

The government takes no position on this application.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Julia L. Gatto, Esq. Assistant Federal Defender Tel.: (212) 417-8750

cc: AUSA Jared Lenow (via ECF)
U.S.P.O. Christopher Ferrall (via email)

6-22-15 SO ORDERED: N.Y., N.Y.

KIMBA M. WOOD